

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of
MARITEL, INC.

and

MOBEX NETWORK SERVICES, LLC

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RM-10743

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JUL 25 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

COMMENTS

Mobex Network Services, LLC (Mobex), by its attorney, hereby files its Comments in support of the above captioned petitions for rulemaking. Mobex shows the following.

The VHF Public Coast service and the Automated Maritime Telecommunications System (AMTS) service (collectively, the Local Maritime Services) were once essential to meeting the needs of a maritime market which was not served by other Radio Services. Then, the Commission authorized a multitude of new services which are free to compete with the Local Maritime Services. But, it has denied the Local Maritime Services the opportunity to meet the general public's needs on a fully responsive and competitive basis.

Pursuant to the Telecommunications Act of 1996, the Commission distinguished between Private Mobile Radio Service and Commercial Mobile Radio Service, but has not applied those distinctions to the Local Maritime Services on a basis which is consistent with other Radio Services. The Commission should amend its rules to provide uniformity of treatment so that the Local Maritime Services can compete fully to meet the needs of the general public.

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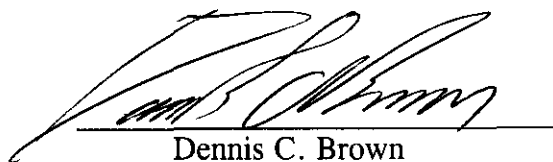
ORIGINAL

With the wide variety of wireless services available today, there is no risk that the maritime public will not receive adequate communications service from many competing providers. Therefore, there is no reason to continue to constrict and to command the Local Maritime Services' offerings to assure service to the maritime public. The Local Maritime Services cannot move to fully utilize their allocated spectrum while frayed hawsers of unnecessary regulation keep them moored at the pier. The Commission should allow the Local Maritime Services to cast off and meet their nationwide competitive potential.

Conclusion

For all the foregoing reasons, the Commission should immediately commence a rulemaking proceeding to amend its Part 80 Rules as suggested by the above captioned petitions of Maritel, Inc. and of Mobex.

Respectfully submitted,
MOBEX NETWORK SERVICES, LLC



Dennis C. Brown

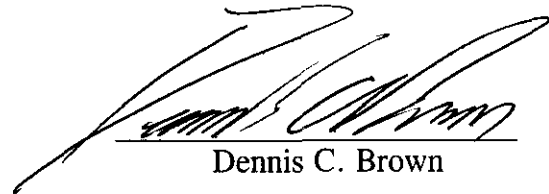
126/B North Bedford Street
Arlington, Virginia 22201
703/525-9630

Dated: July 25, 2003

CERTIFICATE OF SERVICE

I hereby certify that on this twenty-fifth day of July, 2003, I served a copy of the foregoing Comments on the following persons by placing a copy in the United States Mail, first-class postage prepaid:

Russell H. Fox, Esq.
Susan S. Ferrel, Esq.
Mintz, Levin, Cohn, Ferris,
Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, N.W.
Washington, DC 20004-2608



Dennis C. Brown